## **BELLSOUTH**

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Patrick W. Turner

General Counsel-South Carolina

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April 18, 2005

Mr. Charles Terreni Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50

Docket No.: 2005-63-C

Dear Mr. Terreni:

On April 15, 2005, BellSouth Telecommunications, Inc. filed its Answer to the SCTC's Petition to Intervene and Request to Suspend Tariff Filing at the South Carolina Public Service Commission. Unfortunately, we inadvertently filed an unsigned copy of this Answer. Enclosed is an original and ten copies of the signed signature page which I would appreciate your substituting.

By copy of this letter, I am serving all parties of record with a copy of this signed signature page as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Enclosure

cc: All Parties of Record

DM5 #581821

9. BellSouth states that the relevant sections of the Act and of South Carolina statutes speak for themselves and require no response from BellSouth. BellSouth denies that it is somehow precluded from establishing rates, terms, and conditions for transit traffic via tariff and further denies that any suspension of BellSouth's tariff is appropriate. BellSouth denies any remaining allegations in Paragraph 9.

10. BellSouth denies that any suspension of its tariff is appropriate. BellSouth further states that that it has participated in discussions with the parties to this docket, including representatives of the SCTC, in an attempt to negotiate resolution of issues the parties have raised regarding the transit tariff. BellSouth denies any remaining allegations in Paragraph 10.

11. Paragraph 11 of the Complaint does not require a response from BellSouth.

BellSouth also states that all correspondence, pleadings, and other documents related to this proceeding should be sent to the undersigned.

12. BellSouth denies that SCTC is entitled to any of the relief requested in the WHEREFORE clause of the Complaint.

13. Any allegation not expressly admitted herein is denied.

## AFFIRMATIVE DEFENSES

14. SCTC's Complaint fails to state a claim upon which relief can be granted.

Respectfully submitted this 15th day of April, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

PATRICK W. TURNER

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STATE OF SOUTH CAROLINA	)	
	)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND	)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Signed Signature Page to its Answer to SCTC's Petition to Intervene and Request to Suspend Tariff Filing in Docket No. 2005-63-C to be served upon the following this April 18, 2005:

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